

MAY 1 8 1981

Mr. L. Levi, Senior Engineer
B. F. Goodrich Company
Chemical Division
P.O. Box 697
Port Neches, Texas 77651

Dear Mr. Levi:

Enclosed you will find one copy of the National Enforcement Investigations Center report performed at the Common Landfill in September 1980. Also enclosed is the preliminary assessment completed by Ecology and Environment in January 1981.

Please contact Jo Johnson-Ballard at (214) 767-3274 for any additional site information.

Sincerely,

ORIGINAL SIGNED BY

Gerald Fontenot, Chief
Hazardous Materials Enforcement Section, 6E-GH

PORT NECHES BUTANE PRODUCTS CO

Enclosure

TXD 008 063 414

cc: Hazsit Files TX02178

TX02186
TX04774

6E-GH:JOHNSON-BALLARD:sjc:x3274:5/8/81

SUPERFUND FILE

SEP 11 1992

REORGANIZED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF ENFORCEMENT

EPA-330/2-81-008

PERFORMANCE EVALUATION AND SCREENING SAMPLING
JOIN. WASTEWATER TREATMENT PLANT (NECHES BUTANE)
Port Neches, Texas

TXD008063414

May 1981

E. Lubieniecki, Jr.
E. J. Struzeski, Jr.

Report filed in
7802178

7-14-81
hr

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
Denver, Colorado

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SEP 11 1992

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RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSS. ☐ FIELD TRIP ☐ CONFERENCE

☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

Gerald Fontenot

FROM:

Terri Nerryweather

DATE

2/12/81

TIME

12:45 pm

SUBJECT

Inspection Report - ~~Neches Butane~~ / B.F. Goodrich Landfill

SUMMARY OF COMMUNICATION

I spoke with Mr. Steve Stanford (employee of BFG.) and explained that the inspection report he requested was still in draft form and that it had also been declared confidential by Neches Butane. I suggested he submit his request in writing to Gerald Fontenot.

TXD008 063414

(see background info - attached)

CONCLUSIONS, ACTION TAKEN OR REQUIRED

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SEP 10 1992

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INFORMATION COPIES

TO:

Helen Newman Charles Gazda

EPA Form 1300-6 (7-72)

REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

Background Info

Neches Butane Products (TX02186)
B.F. Goodrich Common LF (TX04774)
Common Industrial Landfill (TX02178)

FIT had been tasked to do a recon inspection of the Common Industrial Landfill (TDB #F-6-8012-28). When they contacted the facility representative listed on the site log, the gentleman informed FIT that the site had already been inspected twice before. Steve Stanford was the contact, and he is employed by B.F. Goodrich. Mr. Stanford then called the EPA Regional Office to find out why his site was being investigated again and to get copies of the previous inspection reports. He spoke with Helen Newman, who in turn talked to me.

There were two problems to begin with — 1) determining which site was involved; 2) determining who had conducted the inspection Mr. Stanford was particularly interested in. From the addresses + information in the three files mentioned above, it was determined that there is only one site, a landfill, which is owned by Neches Butane, operated by B.F. Goodrich and used by both. There was an inspection report in file #TX02186 done by Regional EPA personnel in April of 1980. But the inspection report Mr. Stanford requested is being done by NEIC/Denver personnel. NEIC inspected a joint wastewater treatment plant + the Neches Butane Chemical site in September 1980. This included the common landfill used by both Neches + BFG. I contacted Ed Strauzeski (FTS 234-4656) + Gene Lubieniecki (FTS 234-4658) at NEIC to find out more about the inspection.

they had done. They said the report is still in draft form and about ready to send to our Regional office for our review. But they also said the report had been declared confidential, and it would be up to our legal staff to decide what, if any, part of the report could be sent to Mr. Stanford.

TX02186 Nueches Butane Prod. TX2008065414
TX04774 B.F. Goodrich Common LF site
TX02178 Common Ind. LF

NEIC Denver
Ed Strauzeski 234-4656
Gene Lubieniecki 234-4658

September inspection on:
joint ww treatment plant
Nueches Butane Prod. plant
landfill on Nueches Butane property,
operated by B.F. Goodrich
Used by Nueches, BFG, & Synpol, Inc

Steve Stanford
B.F. Goodrich 8-713-722-4301
P.O. Box 697
Port Nueches, TX 77651

SUPERFUND FILE

SEP 10 1992

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ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF ENFORCEMENT
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
BUILDING 53, BOX 25227, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Ferry 1035
cc: [unclear]
[unclear]

TO: Diana C. Dutton, Director
Enforcement Division, Region VI

DATE: October 8, 1980

FROM: Deputy Director

TX02186

SUBJECT: Summary Trip Reports for Port Neches-Port Arthur, Texas Industries

NECHES BUTANE PRODUCTS CO.

TXD008063414

Enclosed are summary trip reports on two of the Port Neches-Port Arthur industries inspected by NEIC in September 1980. These are for the Joint Wastewater Treatment Plant at Port Neches and the Neches Butane Products Company. Remaining reports for the Jefferson Chemical and the Gulf Oil Refinery will follow shortly.

If you have any questions, please contact E. J. Struzeski, Jr. at 234-4656.

William C. Blackman, Jr.
William C. Blackman, Jr.

Enclosures

*RD
10-14-80*

RECEIVED

OCT 15 1980

SUPERFUND FILE

6AEG

SEP 10 1992

REORGANIZED

RECEIVED

OCT 14 1980

6AEP

TX02186

PRELIMINARY REPORT ON THE INSPECTION OF THE JOINT WASTEWATER TREATMENT
PLANT OPERATED BY NECHES BUTANE PRODUCTS COMPANY (JWWTP/NBPC)

BACKGROUND

The NEIC conducted a survey of the JWWTP/NBPC in Port Neches, Texas on September 8-15, 1980. This facility, which is operated by the Neches Butane Products Company, receives wastewater from the following industries: B.F. Goodrich Chemical Company, Neches Butane Products Company, Synpol, Inc. (formerly Texas - U.S. Chemical Company), and Texaco Chemical Company (formerly Jefferson Chemical Company). The study objectives were to:

1. Determine facility compliance with pollution control permits and/or regulations.
2. Determine the adequacy of pollution control operations for wastewater treatment, air emissions, and solid waste disposal.
3. Determine potential of facility to discharge/emit priority/toxic pollutants into the environment and the need for a more intensive second-phase study.

Mr. A. Catanach and other Neches Butane employees were interviewed on facility operations. A plant inspection was also conducted. Major survey observations follow. Additional observations and findings will be provided to Region VI when technical and sample analyses are completed. These will be contained in a future NEIC performance audit report for this plant.

WATER

The problems associated with the wastewater handling aspects of this facility are covered in an NPDES Compliance Inspection Report (EPA Form 3560). Highlights of this report follow.

The JWWTP receives leachate from a common (Neches Butane Products Co., Synpol, Inc., and B.F. Goodrich Chemical Co.) hazardous waste disposal site (the common landfill). This leachate is believed to represent a major waste load contribution to the JWWTP. This loading may not have been previously reported to the appropriate State and Federal NPDES permitting authorities.

The flow measuring weir at NPDES outfall 002 ("uncontaminated" wastewater discharge from B.F. Goodrich Chemical Co. and Synpol, Inc.) is subject to tidal inundation resulting in inaccurate flow measurement.

The flow proportional sampler at NPDES outfall 030 (final effluent outfall) was malfunctioning. Until it is repaired it will composite time, rather than flow proportioned samples.

Heavy precipitation on September 5 and 6 caused bypassing of the treatment facility.

There are several small unpermitted discharges to the Main A Canal (Drainage District #7) which drain areas in and around the landfarm and the inactive landfill site.* The landfarm is discussed later in this report.

* This landfill site will be discussed in the report for the Neches Butane Products Co.

AIR

There are no point sources of air emissions associated with this facility. The Company has not yet developed estimates on emissions from fugitive sources.

SOLID WASTE

Primary sludge is landfarmed in on-site plots. The drainage system outside of these diked plots has the potential of being contaminated by this disposal activity. However, a Texas Department of Water Resources (TDWR) inspection in January 1980 indicated that there is little problem with this site.

Secondary sludge, when wasted, is currently vacuum filtered and shipped to an off-site disposal area.

Skimmed material, mostly from the primary clarifiers, is usually disposed of at the common landfill site.*

Neches Butane's solid waste registration appears to adequately cover these solid waste operations.

* This landfill site will be discussed in the report for the Neches Butane Products Co.

PRELIMINARY REPORT ON THE INSPECTION OF NECHES BUTANE PRODUCTS CO.
PROCESS PLANT AND ASSOCIATED INDUSTRIES
(B.F. GOODRICH CHEMICAL CO. AND SYNPOL, INC.)

BACKGROUND

The NEIC conducted a survey of the Neches Butane Products Co. Process Plant (Neches Butane) and two associated industries in Port Neches, Texas on September 8-15, 1980. Whereas the engineering inspection was almost exclusively devoted to Neches Butane, the NEIC air and water sampling as well as the common landfill inspection involved all three Companies (Neches Butane, B.F. Goodrich Chemical Co., and Synpol, Inc.). The objectives of this study were to:

1. Determine facility compliance with pollution control permits and/or regulations.
2. Determine the adequacy of pollution control operations for wastewater treatment, air emissions, and solid waste disposal.
3. Determine potential of facility to discharge/emit priority/toxic pollutants into the environment and the need for a more intensive second-phase study.

Mr. A. Catanach of Neches Butane, Mr. L. Levi of B.F. Goodrich Chemical Co., Mr. D. Rivette of Synpol, Inc. and other employees were interviewed regarding sources of pollution and pollution control operations. Plant sites were also inspected. Major survey observations follow. Additional observations and findings will be provided to Region VI when technical and sample analyses are completed. These will be contained in a future NEIC performance audit report for these facilities.

WATER

Contaminated wastewater from this plant is treated at the Neches Butane Products Co. Joint Wastewater Treatment Facility. This facility processes wastewater from Neches Butane and several other chemical plants. Aspects of this treatment facility are addressed in a separate report.

The problems associated with wastewater control operations at the Neches Butane Process plant are covered in an NPDES Compliance Inspection Report (EPA Form 3560). Highlights of this report follow:

The 'uncontaminated' wastewater stream (NPDES outfall 020) was observed to be contaminated on two occasions during the inspection; on September 8, a brownish scum and on September 11, an oil sheen.

There are several unpermitted discharges to Drainage District #7 ditch. These include steam condensate from boiler #7 and storm run-off from this and several other areas.

AIR

The 1975 air emissions inventory is badly outdated due to extensive changes in plant operations. Current emissions appear to be in compliance with regulations.

SOLID WASTE

This plant uses both on and off-site solid waste disposal facilities. The current active on-site disposal area is identified as the common landfill site. It is located on Neches Butane property but is managed by B.F. Goodrich Chemical Company. Synpol, Inc. (formerly Texas-U.S. Chemical Co.) and B.F. Goodrich Chemical Company also use this registered

Class I site. Because the Neches Butane Outfall Canal flows through the landfill, there is a definite potential for its contamination from the site. However, a January 1980 Texas Department of Water Resources (TDWR) inspection indicated that this facility does not present a pollution problem.

There is also an inactive surface landfill on Neches Butane property. Wastes at this site, which include Class I, II, and III materials, have not been covered. A January 1980 TDWR inspection indicated that this site has the potential to contaminate storm water runoff.

Off-site hazardous waste disposal is contracted to several local companies.

There is a minor discrepancy between an actual shipping ticket and the TDWR record for that shipment. Shipping ticket 059340 indicates that on May 21, 1978 Browning Ferris Ind. disposed of 15,900 l (4,200 gal) of spent hydrochloric acid. However, TDWR files indicate that this shipment was for 15,900 l (4,200 gal) of API separator bottoms. Neches Butane is not a registered generator of hydrochloric acid waste.

Except for the problem noted above the Neches Butane solid waste registration appears to adequately cover these solid waste operations.